

GEORGE FELDMAN MCDONALD, PLLC
Lori G. Feldman (*pro hac vice*)
Michael Liskow (State Bar No. 243899)
200 Park Avenue, Suite 1700
New York, New York 10166
Telephone: (646) 354-6534
lfeldman@4-justice.com
mliskow@4-justice.com

BURSOR & FISHER, P.A.
Neal J. Deckant (State Bar No. 322946)
1990 North California Blvd., Ninth Floor
Walnut Creek, CA 94596
Telephone: (925) 300-4455
ndeckant@bursor.com

*Attorneys for Plaintiffs
Additional Attorneys on Signature Page*

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IN RE META PIXEL TAX FILING CASES

This document relates to:

All Actions

Case No.: 5:22-cv-07557-PCP (VKD)

**DECLARATION OF KATE M. BAXTER-
KAUF IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANT META
PLATFORM INC.'S MOTION TO
EXCLUDE THE EXPERT REPORT AND
TESTIMONY OF ROBERT ZEIDMAN**

Date: January 15, 2026
Time: 10:00 a.m.
Court: Courtroom 8, 4th Floor
Honorable P. Casey Pitts

1 I, Kate, Baxter-Kauf, declare as follows:

2 1. I am an attorney licensed to practice in the State of Minnesota, in good standing as
3 an active member of the Bar in the State of Minnesota, and appearing in this Court *pro hac vice*.
4 I am a partner at the law firm Lockridge Grindal Nauen PLLP counsel of record for Plaintiffs in
5 this case. I have personal knowledge of the facts stated below and, if called as a witness, I could
6 and would testify competently thereto.

7 2. I submit this declaration in support of Plaintiff's Opposition to Defendant Meta
8 Platforms, Inc.'s Motion to Exclude the Expert Report and Testimony of Robert Zeidman.

9 3. Each document is being filed under seal pursuant to the operative protective order
10 in this case either because Meta designated cited portions as confidential or the document
11 describes information that Meta designated as confidential.

12 4. Attached hereto as **Exhibit A** is a true and correct copy of excerpts of the deposition
13 transcript of Robert Zeidman, who was deposed in this matter on October 3, 2025.

14 5. Attached hereto as **Exhibit B** is a true and correct copy of excerpts of the deposition
15 transcript of Georgios Zervas, Ph.D., who was deposed in this matter on December 2, 2025.

16 I declare under penalty of perjury that the foregoing is true and correct. Executed on
17 December 15, 2025, at Minneapolis, Minnesota.

18 By: /s/ Kate Baxter-Kauf
19 Kate Baxter-Kauf

EXHIBIT A

REDACTED

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION B

IN RE META PIXEL TAX FILING)
CASES)
Case No. 5:22-cv-07557-PCP)
(VKA), All Actions)

HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

VIDEOTAPED DEPOSITION OF ROBERT ZEIDMAN
Las Vegas, Nevada
Friday, October 3, 2025
9:36 a.m.

Reported by: Jill E. Shepherd, RPR,
NV CCR 948
CA CSR 13275
MA CSR 1408608
UT CSR 10410191-7801
Job No. 7625547; Firm No. 053F

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1 VIDEOTAPED DEPOSITION OF ROBERT ZEIDMAN, a
2 witness called on behalf of the Defendants, before
3 Jill E. Shepherd, RPR, NV-CCR #948, CA-CSR #13275,
4 at the offices of McDonald & Carano, 2300 West
5 Sahara Avenue, Las Vegas, Nevada, on Friday,
6 October 3, 2025, 9:36 a.m.

7

8

9 APPEARANCES:

10

11 For the Plaintiffs:

12 GEORGE FELDMAN MCDONALD, PLLC
13 By: Michael Liskow, Esq.
14 745 Fifth Avenue, Suite 500
15 New York, New York 10151
16 718.878.6433
17 mliskow@4-Justice.com

18

19 For the Defendants:

20 LATHAM & WATKINS
21 By: Jessica Stebbins Bina, Esq.
22 10250 Constellation Boulevard, Suite 1100
23 Los Angeles, California 90067
24 424.391.0600
25 jessica.stebbinsbina@lw.com

26

-- and --

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1 APPEARANCES CONTINUED:

2

LATHAM & WATKINS, LLP

3

By: Lauren Robertson, Esq.

4

1271 Avenue of the Americas

5

212.906.4865

6

lauren.robertson@lw.com

7

8

9

10 ALSO PRESENT:

11

Tiffany Tandingan, Videographer

12

Maksym Khomenko, expert witness (via Zoom)

13

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1 37, you describe different kinds of events and 10:52:14
2 material. When you say "various kinds of data" in 10:52:24
3 your conclusion, are you referring to what's 10:52:26
4 described in paragraphs 36 and 37? 10:52:29

5 A. Yes. 10:52:32

6 Q. Let's go back to paragraph 57. I want to 10:52:33
7 look at 57.2. Actually, before I get to 52, what do 10:52:39
8 you mean by "largely uniform"? 10:52:44

9 A. Largely -- by largely uniform, I mean that 10:52:46
10 with respect to the data -- some data is sent from 10:52:54
11 every website that contains a Meta Pixel, and some 10:52:59
12 data is determined by the specific tag that the tax 10:53:03
13 preparer included on their website. But if it's the 10:53:11
14 automatic data, it's all the same for each tax 10:53:16
15 preparers' website. If it's some of the custom data 10:53:20
16 or that's determined by developer of the tax 10:53:25
17 preparer website, it's limited to data and data that 10:53:29
18 Facebook describes how to send. So in other words, 10:53:39
19 although it may be -- the tax preparer may choose 10:53:44
20 which data to send, Meta describes which data can be 10:53:48
21 sent. So it's -- there's nothing that's allowed 10:53:51
22 differently from each website. And that's what I 10:53:56
23 mean by done in a uniform manner. 10:53:59

24 Q. I just want to break that down a little 10:54:01
25 bit. 10:54:03

26

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1 When you say the tax preparer may choose 10:54:03
2 which data to send, but Meta describes the data that 10:54:07
3 can be sent, does that mean, in your understanding, 10:54:11
4 that there's a list of kinds of data that can be 10:54:15
5 sent and everything falls into those categories? 10:54:21

6 A. Well, if we look at the earlier paragraph 10:54:25
7 you pointed me to, which was -- 10:54:28

8 Q. 37, I believe? 10:54:34

9 A. Actually, I'm thinking of 36. 10:54:39

10 Q. Okay. 10:54:42

11 A. There are three kinds of events, which 10:54:43
12 represent three kinds of data that Meta specifies 10:54:45
13 can be sent to Meta through a Meta Pixel. And by 10:54:51
14 uniform, I mean that although each website may have 10:54:58
15 some different data, they do it in a manner that's 10:55:02
16 described by Meta. So standard events are a list of 10:55:05
17 events that the user can choose to send to Meta. 10:55:11
18 That means that specific data that the -- sorry, 10:55:16
19 that the tax preparer site could choose to send to 10:55:21
20 Meta. 10:55:24

21 The custom events are other data that Meta 10:55:25
22 explains how to send, but is up to the tax preparer 10:55:31
23 itself or the developers of the tax preparer site to 10:55:35
24 send. And then automatic events are sent regardless 10:55:39
25 of what the developer does. So those or defined 10:55:42
26

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1 specifically by Meta. And again, by events, that 10:55:45
2 really means the kind of data that's sent. 10:55:49

3 Q. And so in your definition, custom events 10:55:54
4 are still uniform even though they are defined by 10:55:59
5 the client's -- or by the operator, the tax preparer 10:56:03
6 website, because there is a description from Meta on 10:56:10
7 how to set up a custom event? 10:56:15

8 A. Correct. 10:56:17

9 Q. Let's go back to paragraph 57. 10:56:18

10 Let's look at 57.2. 10:56:21

11 You looked at samples of visitor data from 10:56:26
12 the tax preparer's website that Meta produced to 10:56:29
13 plaintiffs from its repository of Hive data. 10:56:33

14 And when you say "samples," are those 10:56:38
15 specific samples listed on your Exhibit A? 10:56:43

16 A. Yes. 10:56:51

17 Q. And what are they listed as? 10:56:52

18 A. That's number 1, the data produced by Meta 10:56:54
19 to plaintiff's, including event data sample and 10:56:58
20 representative data. 10:57:02

21 Q. And your next sentence is: "I determined 10:57:07
22 that the data included 'pen register' data -- and 10:57:10
23 pen register is quotes -- that was transmitted from 10:57:14
24 each visit to the tax preparer's website to Meta as 10:57:17
25 well as other data reflecting visitors' tax 10:57:22
26

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1 Q. Sure. It's near the bottom of 57, 11:16:54
2 paragraph 2. 11:16:56

3 A. Oh. Two. Okay. 11:16:56

4 Q. Yes. This is the paragraph we were just 11:16:58
5 looking at about pen register. You say, 11:16:59

6 "transcended pen register data as well as" -- and 11:17:05
7 it's about halfway through the paragraph -- "other 11:17:06
8 data reflecting visitors' tax information and other 11:17:09
9 financial concerns." 11:17:11

10 A. And your question is what other financial 11:17:13
11 concerns? 11:17:18

12 Q. What data -- what's in this category, 11:17:18
13 "reflecting visitors' tax information and other 11:17:21
14 financial concerns." I can break it up if you want. 11:17:27

15 What is visitors' tax information? 11:17:29

16 A. So I have examples in paragraph 46. 11:17:32

17 Q. Okay. Go ahead. 11:17:47

18 A. This is information that Meta confirmed was 11:17:57
19 being sent through the Meta Pixel, and there's a 11:18:00
20 list of information there including e-mails, 11:18:05

21 [REDACTED] 11:18:12

22 [REDACTED] 11:18:16

23 Q. Okay. So which items in paragraph 46 11:18:20
24 constitute tax information? 11:18:23

25 A. I'm not certain which each individual 11:18:24
26

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1 data -- piece of data represents, but my 11:18:32
2 understanding -- and I'm not an accountant, but my 11:18:37
3 [REDACTED] 11:18:42
4 [REDACTED] 11:18:51
5 [REDACTED] 11:18:55
6 [REDACTED] [REDACTED] 11:19:00
7 [REDACTED] [REDACTED] 11:19:02
8 [REDACTED] [REDACTED] 11:19:04
9 [REDACTED] [REDACTED] [REDACTED] 11:19:11
10 those, I believe are -- in my understanding, are 11:19:20
11 tax-related information. There's also in paragraph 11:19:25
12 47 I list other information that Meta admitted was 11:19:35
13 [REDACTED] 11:19:40
14 [REDACTED] [REDACTED] 11:19:47
15 [REDACTED] [REDACTED] 11:19:53
16 [REDACTED]. 11:19:58
17 Q. Okay. 11:20:02
18 So did you do any independent work to 11:20:03
19 determine what each of these categories means? 11:20:07
20 A. Well, I can -- I believe that Meta 11:20:14
21 confirmed, and I have that in Exhibit M in the 11:20:18
22 responses and Exhibit N in responses, and also in 11:20:22
23 paragraph 49 there is an event data sample that Meta 11:20:27
24 [REDACTED] 11:20:34
25 [REDACTED] 11:20:37
26

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1 the case? 11:23:38

2 A. I found this data in the Hive data that I 11:23:38

3 was provided. 11:23:45

4 Q. But did you do anything to quantify it? 11:23:45

5 MR. LISKOW: Objection. Vague. 11:23:48

6 THE WITNESS: With regard to how often? 11:23:49

7 Not that I recall, but I can do that. I do have 11:23:52

8 some quantification about the number of visits. 11:23:57

9 BY MS. STEBBINS BINA: 11:23:57

10 Q. Well I'd like to go back to paragraph 57.2. 11:24:00

11 You state there that there was, quote: "An enormous 11:24:04

12 amount of tax information and other data 11:24:09

13 transmitted." 11:24:12

14 Is that correct? 11:24:14

15 A. Yes. 11:24:15

16 Q. What is your basis for determining that it 11:24:18

17 was an enormous amount of tax information and other 11:24:22

18 data? 11:24:25

19 A. Well, enormous is, of course, a 11:24:26

20 non-technical term, it's not a quantifiable or 11:24:29

21 quantity; however, the -- the spreadsheets that I 11:24:34

22 received as a sample of data from Meta was, when put 11:24:42

23 into a database, created a database that was as I 11:24:49

24 recall, [REDACTED] over a limited period 11:24:52

25 of time. And it was so much that I had to get a -- 11:24:55

26

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1 one of the top end solid state drives. And as a 11:25:03
2 spreadsheet, it was virtually unusable because the 11:25:13
3 spreadsheet program Excel could not open it -- any 11:25:16
4 one of these, and there were, I believe, [REDACTED] 11:25:21
5 So Excel had difficulty opening one of them, and 11:25:26
6 putting it into a database took a while to search. 11:25:30
7 So I think although [REDACTED] 11:25:34
8 term, it just meant that there was a very large 11:25:38
9 amount of data by any standard that I'm used to. 11:25:43
10 Q. Is it your testimony that every event in 11:25:46
11 that database included fields similar to those 11:25:50
12 described in paragraphs 46, 47, and 49 of your 11:25:55
13 report? 11:26:00
14 A. Not every one, but when I wrote a script to 11:26:00
15 find the data, there was a very large amount of it. 11:26:11
16 I don't recall the exact number. 11:26:14
17 Q. Do you have any sense of whether it was 11:26:16
18 more or less than half of the entries? 11:26:18
19 A. I don't recall. 11:26:20
20 Q. More or less than 10 percent of the 11:26:22
21 entries? 11:26:26
22 MR. LISKOW: Objection. Asked and 11:26:26
23 answered. 11:26:27
24 THE WITNESS: I don't recall. One issue 11:26:27
25 that I run into as with any database program that 11:26:30
26

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1 [REDACTED] 11:30:45
2 [REDACTED] 11:30:49
3 A. I think [REDACTED] 11:30:49
4 [REDACTED] 11:30:54
5 I talk about in Section D of my report, starting 11:30:59
6 with paragraph 51, how I proposed doing that. 11:31:02
7 Q. So the last sentence of 57.2, is supported 11:31:08
8 by Section D of your report? 11:31:13
9 A. Yes. 11:31:15
10 Q. We'll come back to that then. 11:31:16
11 A. Sure, let me just clarify that. It's 11:31:20
12 specifically Section 5(D). 11:31:22
13 Q. Did you do anything to determine that the 11:31:26
14 transmission -- that the materials that the tax 11:31:33
15 preparers chose to send to Meta via the Meta Pixel, 11:31:39
16 was uniform over the proposed class periods? 11:31:43
17 A. Well, I looked at the documentation that 11:31:46
18 Meta provided about how to do it, so in the sense 11:31:54
19 that Meta provided rules that at least is one 11:31:58
20 understanding of uniformity, but I also did search 11:32:05
21 through these enormous -- let's say through the 11:32:09
22 enormous database and pulled up some of these 11:32:15
23 spreadsheets to look at them directly in Excel, 11:32:20
24 which took a really long time, actually, sometimes 11:32:24
25 in Notepad++ -- that's a product, Notepad++, to 11:32:29
26

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1 visually confirm it. I don't recall if I did, for 11:32:39
2 example, run a script to examine any of the data or 11:32:43
3 its -- how often any particular item of data was 11:32:47
4 transmitted. 11:32:51

5 Q. What time period did the event data sample 11:32:52
6 and representative data cover? 11:32:56

7 A. So my understanding of the event data 11:32:58
8 sample was data from the [REDACTED] 11:33:22
9 [REDACTED] between April 2022, and April 2023. 11:33:31

10 Q. The proposed classes in this period cover a 11:33:38
11 somewhat broader time period than that, correct? 11:33:44

12 A. Yes. 11:33:47

13 Q. Did you look at any documentation from the 11:33:47
14 earlier periods or later periods to determine 11:33:54
15 whether or not the pixel functioned in the same way 11:33:58
16 at those earlier or later times? 11:34:00

17 A. So if I understand your question, you are 11:34:03
18 asking me if the Meta Pixel functioned in the same 11:34:07
19 way between those times? 11:34:12

20 Q. Or your testimony is that the Meta Pixel 11:34:13
21 collected and transmitted various types of data to 11:34:17
22 Meta during the relevant class periods and doing so 11:34:20
23 in a largely uniform manner on each website during 11:34:23
24 the relevant class periods. 11:34:26

25 And so I'm asking: What did you do to 11:34:28
26

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1 Q. So if there is a way to turn off automatic 11:50:31
2 configuration in the current Meta pixel, would that 11:50:34
3 affect your opinion that the data was absolutely 11:50:39
4 transmitted in a uniform manner across the proposed 11:50:41
5 class periods? 11:50:45

6 MR. LISKOW: Objection. Vague. 11:50:45

7 THE WITNESS: I still think it's uniform in 11:50:47
8 that each visitor to each tax preparer's website 11:50:50
9 sent the same type of information contingent on 11:50:57
10 their actions at the website and that it was 11:51:01
11 controlled by what Meta allowed. 11:51:03

12 BY MS. STEBBINS BINA: 11:51:03

13 Q. But isn't the issue in this case about 11:51:10
14 whether or not personal or confidential tax 11:51:13
15 information was transmitted? 11:51:16

16 MR. LISKOW: Objection. Calls for a legal 11:51:18
17 conclusion. 11:51:19

18 BY MS. STEBBINS BINA: 11:51:19

19 Q. I'm just asking for your understanding of 11:51:21
20 the case? 11:51:23

21 MR. LISKOW: Objection. Call for a legal 11:51:23
22 conclusion. 11:51:25

23 BY MS. STEBBINS BINA: 11:51:25

24 Q. You can still answer. 11:51:25

25 A. That's my understanding and whether some of 11:51:27

26

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1 Q. And you are not providing any opinions with 11:55:52
2 respect to TaxSlayer, correct? 11:55:54

3 A. That's correct. 11:55:56

4 Q. This document itself does not state that 11:55:57
5 the pixel operated in uniform manner over those 11:56:02
6 periods, correct? 11:56:05

7 A. It does not specifically state that, no. 11:56:06

8 Q. And then we looked also at Exhibits 7, 8, 11:56:18
9 and 9, all of which were printed in August 2025, 11:56:25
10 correct? 11:56:32

11 A. That's correct. 11:56:32

12 Q. And, at least, as we sit here today, none 11:56:33
13 of these three printed documents demonstrate that it 11:56:36
14 could be operated in a uniform manner over the 11:56:40
15 proposed class periods, right? 11:56:43

16 A. It's my understanding that that is the 11:56:45
17 case, but these documents do not specifically state 11:56:48
18 that. 11:56:50

19 Q. Is there anything else in your materials 11:56:51
20 relied upon that you believe does state that? 11:56:54

21 A. Well, again, I believe it is the data, at 11:57:30
22 least, the data produced by Meta. The event data 11:57:33
23 sample and the representative data, my analysis 11:57:37
24 shows that it's uniform again in that this data was 11:57:41
25 transmitted during the period and that it was 11:57:45
26

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1 controlled by Meta in the rules that Meta set. 11:57:49
2 Q. In 2022 and 2023? 11:57:53
3 A. Yes. That's correct. 11:57:55
4 Q. Even though during that time period, there 11:57:58
5 were [REDACTED] ? 11:58:00
6 A. I can't confirm that. I would need to go 11:58:05
7 and confirm that. 11:58:07
8 Q. Anything else on Exhibit A that you are 11:58:08
9 relying on for your opinion that the Meta Pixel 11:58:11
10 operated in a uniform manner over the proposed class 11:58:15
11 periods? And I'm looking specifically with respect 11:58:19
12 to time here. 11:58:21
13 A. I don't think we've looked at Exhibit L and 11:58:23
14 I would need to refresh my memory about what's in 11:58:30
15 that. 11:58:32
16 Q. Sure. 11:58:33
17 MS. STEBBINS BINA: Let's mark that as 11:58:34
18 Exhibit 12. 11:58:36
19 (Exhibit 12 marked.) 11:58:38
20 THE WITNESS: And I'm not sure we looked at 11:58:38
21 Exhibit E. 11:59:04
22 MS. STEBBINS BINA: You can grab that one 11:59:09
23 too and mark it as 13. 11:59:11
24 (Exhibit 13 marked.) 11:59:11
25 THE WITNESS: There's also information in 11:59:23
26

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1 provide the opinions you were asked to provide in 13:21:13
2 this case? 13:21:15

3 MR. LISKOW: I want to object generally to 13:21:16
4 this line of questioning, only in the narrow sense 13:21:19
5 of the extent that the answers to these types of 13:21:22
6 questions require discussion of our -- your 13:21:25
7 communications with us as counsel, but are not facts 13:21:28
8 or assumptions we provided to you, I will caution 13:21:32
9 you to avoid those. But, otherwise. 13:21:35

10 BY MS. STEBBINS BINA: 13:21:39

11 Q. I'm just asking what you did to determine 13:21:39
12 what you needed to rely on. If the answer is, you 13:21:44
13 know, you provided documents by counsel and asked to 13:21:47
14 use those as your basis for your report, that's 13:21:50
15 fine. I'm just wondering if you, you know, if you 13:21:52
16 did anything additional or further or kind of how 13:21:54
17 you went through that process. 13:21:56

18 A. Well, the process was that I was given 13:21:58
19 documents that counsel thought would be relevant to 13:22:02
20 my opinions. And then as I developed my opinions 13:22:05
21 and did my analysis, I requested documents saying, I 13:22:09
22 need to understand this issue or, you know, is there 13:22:13
23 any testimony about this particular fact. And then 13:22:17
24 if there was, I was supplied with those documents. 13:22:21
25 And this was an ongoing process of back and forth. 13:22:26

26

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1 page and says, you know, "Do you want to accept 13:34:17
2 cookies? Do you want to allow data sharing?" Or 13:34:22
3 "Don't sell or share my information," is how they 13:34:25
4 are often presented? 13:34:28

5 A. That's my understanding. 13:34:29

6 Q. And if a consent banner is implemented on a 13:34:30
7 website or a web page, that could change the Meta 13:34:35
8 Pixel's functionality, right? 13:34:39

9 MR. LISKOW: Objection. Vague. 13:34:41

10 THE WITNESS: That could, yes. 13:34:43

11 BY MS. STEBBINS BINA: 13:34:45

12 Q. Do you know whether or not H&R Block or 13:34:45
13 TaxAct ever instituted any kind of operator 13:34:53
14 consent -- operator consents with respect to the 13:34:57
15 installation of the Meta Pixel or operation of the 13:35:01
16 Meta Pixel? 13:35:04

17 MR. LISKOW: Objection. Vague. 13:35:04

18 THE WITNESS: Are you referring to the 13:35:05
19 banner we were just discussing? 13:35:08

20 BY MS. STEBBINS BINA: 13:35:08

21 Q. Something like a banner, yes. Anything 13:35:09
22 along those lines. 13:35:12

23 MR. LISKOW: Same objection. 13:35:12

24 THE WITNESS: I'm not aware if they did or 13:35:14
25 didn't implement something like that. 13:35:16

26

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1	BY MS. STEBBINS BINA:	13:35:16
2	Q. If they did, in fact, implement something	13:35:18
3	like that for some portion of their users, would	13:35:20
4	that impact your opinion as to whether the sites	13:35:23
5	operated -- the pixel operated in a uniform manner?	13:35:27
6	MR. LISKOW: Same objection.	13:35:30
7	THE WITNESS: From what I saw on the data,	13:35:30
8	it was uniform, so I don't know what was	13:35:34
9	implemented, but as I use the term as I saw in the	13:35:37
10	data, it was uniform.	13:35:41
11	BY MS. STEBBINS BINA:	13:35:41
12	Q. But if it were not uniform, I'm going to	13:35:43
13	ask you to assume that it was not uniform and that,	13:35:46
14	in fact, they operated in some portions, would that	13:35:48
15	impact your opinion?	13:35:54
16	MR. LISKOW: Objection. Misstates	13:35:55
17	testimony and vague.	13:35:57
18	THE WITNESS: I think I need to think about	13:35:57
19	it because I need to -- I think we would need to	13:35:59
20	come to a, perhaps, more detailed understanding of	13:36:02
21	what we meant by uniform.	13:36:05
22	BY MS. STEBBINS BINA:	13:36:06
23	Q. But uniform is in your opinions, so I think	13:36:08
24	it's certainly helpful and important to clarify what	13:36:12
25	you mean by uniform.	13:36:14
26		

HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

1	A. I do know that.	13:41:43
2	Q. Would the fact that some users used such	13:41:44
3	private browsing modes impact your opinion as to	13:41:52
4	whether or not the Pixel operated in a substantially	13:41:54
5	uniform manner?	13:41:58
6	A. I don't believe so.	13:41:59
7	Q. What about the VPNs? Do you understand	13:42:00
8	that when I say "VPN," I mean virtual private	13:42:05
9	network?	13:42:08
10	A. Yes.	13:42:08
11	Q. I'm sort of giving you background.	13:42:09
12	A VPN will mask a user's IP address, right,	13:42:12
13	such that the user's real IP address is typically	13:42:17
14	not transmitted?	13:42:21
15	A. That's correct.	13:42:21
16	Q. So, for example, if I use a VPN from	13:42:22
17	California, I might show up as being in Europe	13:42:26
18	somewhere?	13:42:28
19	A. That's correct.	13:42:29
20	Q. Your report does not analyze anything about	13:42:30
21	how Meta matches data to users, right?	13:42:47
22	A. That's correct.	13:42:51
23	Q. Do you have any technical understanding of	13:42:51
24	what Meta does or doesn't do to match data?	13:42:56
25	A. I have a general understanding about	13:42:59
26		

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1 and [REDACTED] 14:07:02
2 [REDACTED] 14:07:06
3 [REDACTED], end quote. Right? 14:07:09
4 A. Yes. 14:07:12
5 Q. Do you understand what " [REDACTED] 14:07:13
6 [REDACTED]" means here? 14:07:18
7 A. Sorry. Could you repeat the question? 14:07:20
8 Q. Sure. Do you understand what " [REDACTED] 14:07:27
9 [REDACTED]" means here? 14:07:29
10 A. Yes. So my understanding is that there was 14:07:31
11 [REDACTED] 14:07:35
12 [REDACTED] 14:07:41
13 [REDACTED]. 14:07:45
14 Q. So your testimony, I think, is that there 14:07:48
15 was an [REDACTED] 14:07:53
16 [REDACTED] 14:07:58
17 [REDACTED] [REDACTED] 14:08:01
18 [REDACTED] 14:08:04
19 [REDACTED] 14:08:07
20 correct? 14:08:09
21 A. Yes. 14:08:10
22 Q. What is an IP address? 14:08:10
23 A. Everything -- well, it's an Internet 14:08:14
24 protocol address, and everything connected to the 14:08:19
25 Internet has to have a distinct address. It's a 14:08:22
26

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1	A. That's correct.	14:10:41
2	Q. And an IP address could be reassigned from	14:10:44
3	one person to another by a network?	14:10:47
4	A. That's correct.	14:10:51
5	Q. IP addresses are not always reliable for a	14:10:52
6	specific geolocation, right?	14:10:57
7	A. I'm not sure. I think although IP	14:10:58
8	addresses can be changed, I think they generally	14:11:06
9	don't change significantly. And I'm not familiar	14:11:08
10	with the process of mapping IP addresses to	14:11:12
11	geolocations, but I think it's fairly reliable.	14:11:16
12	Q. And do you know how precise it is?	14:11:20
13	A. I can't -- I can't quantify how precise it	14:11:23
14	is.	14:11:30
15	Q. For example, former plaintiff Crystal Craig	14:11:30
16	is listed as residing in Illinois per the second	14:11:33
17	amended class action complaints, right?	14:11:37
18	A. I don't recall.	14:11:40
19	Q. Any reason to doubt me? I can pull out the	14:11:41
20	second amended class action complaint, if you like?	14:11:44
21	A. I have no reason to doubt you.	14:11:46
22	Q. So let's assume she's a citizen of	14:11:48
23	Illinois. In the data, would it surprise you to	14:11:51
24	know that she's associated with a location in	14:11:57
25	Belleview, Wisconsin, ZIP 54311.	14:11:57
26		

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1 THE VIDEOGRAPHER: This concludes today's 15:36:27
2 deposition of Robert Zeidman. We are now going off 15:36:29
3 the record at 3:36 p.m. 15:36:32
4 (Whereby the proceedings were adjourned at 15:36:36
5 3:36 p.m.)
6 * * * * *

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1 REPORTER'S CERTIFICATE
2 STATE OF NEVADA)
3) ss
4 COUNTY OF CLARK)
5 I, JILL E. SHEPHERD, CA-CSR 13275;
6 NV-CSR 948, RPR, do hereby certify:

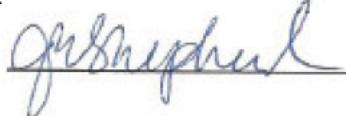
7
8 That I reported the taking of the
9 deposition of ROBERT ZEIDMAN commencing on
October 3, 2025, at the hour of 9:36 a.m.

10 That prior to being examined, the
11 witness was by me duly sworn to testify to the
truth, the whole truth, and nothing but the truth.

12 That I thereafter transcribed my
13 said shorthand notes into typewriting, and that the
14 typewritten transcript of said deposition is a
15 complete, true, and accurate transcription of my
16 said shorthand notes taken down at said time.

17 I further certify that (1) I am not
18 a relative, employee or independent contractor of
counsel of any of the parties; nor a relative,
employee or independent contractor of the parties
involved in said action; nor a person financially
interested in the action; nor do I have any other
relationship with any of the parties or with counsel
of any of the parties involved in the action that
may reasonably cause my impartiality to be
questioned; and (2) that a request has been made to
review the transcript.

19 IN WITNESS WHEREOF, I have hereunto
20 set my hand and affixed my official seal of office
in the County of Clark, State of Nevada, this 10th
day of October 2025

21 

22 Jill E. Shepherd, RPR
NV CCR 948
CA CSR 13275
MA CSR 1408608
UT-CSR 10410191-7801

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1 Jessica Stebbins Bina, Esq.

2 jessica.stebbinsbina@lw.com

3 October 10, 2025

4 RE: In Re Meta Pixel Filing Cases v.

5 10/3/2025, Robert Zeidman, (#7625547).

6 The above-referenced transcript has been

7 completed by Veritext Legal Solutions and

8 review of the transcript is being handled as follows:

9 __ Per CA State Code (CCP 2025.520 (a)-(e)) - Contact Veritext
10 to schedule a time to review the original transcript at
11 a Veritext office.

12 __ Per CA State Code (CCP 2025.520 (a)-(e)) - Locked .PDF
13 Transcript - The witness should review the transcript and
14 make any necessary corrections on the errata pages included
15 below, notating the page and line number of the corrections.
16 The witness should then sign and date the errata and penalty
17 of perjury pages and return the completed pages to all
18 appearing counsel within the period of time determined at
19 the deposition or provided by the Code of Civil Procedure.
20 Contact Veritext when the sealed original is required.

21 __ Waiving the CA Code of Civil Procedure per Stipulation of
22 Counsel - Original transcript to be released for signature
23 as determined at the deposition.

24 __ Signature Waived - Reading & Signature was waived at the
25 time of the deposition.

HIGHLY CONFIDENTIAL UNDER THE PROTECTIVE ORDER

1 Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF
2 Transcript - The witness should review the transcript and
3 make any necessary corrections on the errata pages included
4 below, notating the page and line number of the corrections.
5 The witness should then sign and date the errata and penalty
6 of perjury pages and return the completed pages to all
7 appearing counsel within the period of time determined at
8 the deposition or provided by the Federal Rules.
9 _X_ Federal R&S Not Requested - Reading & Signature was not
10 requested before the completion of the deposition.

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EXHIBIT B

**FILED UNDER
SEAL**